

LOVELL STEWART HALEBIAN JACOBSON LLP

61 Broadway, Suite 501
New York, New York 10006
www.lshllp.com

March 24, 2016

BY ECF AND EMAIL

ForrestNYSDCambers@nysd.uscourts.gov

The Honorable Katherine B. Forrest
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

Re: In re Aluminum Warehousing Antitrust Litigation, MDL No. 2481, Master
File No. 13 MD 2481 (KBF)

Dear Judge Forrest:

As an attorney for the class action Plaintiffs (“Plaintiffs”), I write pursuant to Rule 1.G of Your Honor’s Individual Rules of Practice in Civil Cases in order to respectfully request that the page length for Plaintiffs’ memorandum of law in support of their class certification motion be extended from 25 pages to up to a total of 45 pages. Plaintiffs have not previously requested a page extension on this motion. Defendants do not object to this request. As reasons for this relief, Plaintiffs respectfully state as follows:

1. Plaintiffs intend to serve tomorrow four expert declarations and two fact declarations in support of their motion.
2. For (as we hope) the convenience of the Court, Plaintiffs intend to incorporate into the body of the brief meaningful explanations of the expert opinions, the regression analyses, and important facts presented in these declarations.
3. (a) This Court has previously stated that “this case does not fit into any traditional box.” *In re Aluminum Warehousing Antitrust Litig.*, 95 F.Supp.3d 419, 443 (S.D.N.Y. 2015).

(b) Some portions of the brief consist of meaningful explanations of the connections between Defendants’ conduct and aluminum prices that would not be required in a horizontal conspiracy of widget manufacturers to increase the prices of their widgets.

Hon. Katherine B. Forrest

March 24, 2016

Page 2 of 2

Plaintiffs respectfully submit that, in the above circumstances, an extension to up to 45 pages is appropriate.

Thank you very much.

Respectfully submitted,

/s/ Christopher Lovell
Christopher Lovell

Interim Co-Lead Counsel for Direct
Purchaser Plaintiffs

cc: All Counsel of Record (by ECF)